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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA

13 Case Nos. 1:23-mj-00136-SKO;
1:24-cr-00159-NODJ-BAM

14 Plaintiff,

15
16 STIPULATION TO VACATE
PRELIMINARY HEARING AND
SCHEDULE CHANGE OF PLEA
HEARING

17 v.

18 IRMA OLGUIN, JR., and
JAKE SOBERAL,

19 Defendants.

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22 IT IS HEREBY STIPULATED between the parties that the preliminary hearing
23 scheduled for July 18, 2024, can be vacated and a change of plea hearing can be scheduled for
24 July 17, 2024, at 8:30 a.m. The parties have reached plea agreements to resolve the case and will
25 file the agreements with the Court shortly.

26 Time under the Speedy Trial Act has already been excluded through July 18, 2024. Out
27 of an abundance, the parties request that the Court further exclude time under the Speedy Trial
28 Act from the date this stipulation is filed through July 17, 2024, for purposes of plea

1 negotiations, defense preparation, and continuity of defense counsel pursuant to Fed. R. Crim. P.
2 5.1(d) and 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv). The parties agree that the interests of
3 justice served by granting this request outweigh the best interests of the public and the defendant
4 in a speedy trial.

5 IT IS SO STIPULATED.

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Dated: July 2, 2024

PHILLIP A. TALBERT
United States Attorney

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Dated: July 2, 2024

/s/ Joseph Barton

Joseph Barton
Henry Carbajal III
Assistant United States Attorneys

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Dated: July 2, 2024

/s/ Daniel Olmos

Daniel Olmos
Counsel for Irma Olguin, Jr.

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/s/ Eric MacMichael

Eric MacMichael
Counsel for Jake Soberal

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Case Nos. 1:23-mj-00136-SKO;
1:24-cr-00159-NODJ-BAM

Plaintiff,

ORDER VACATING PRELIMINARY
HEARING AND SCHEDULING CHANGE
OF PLEA HEARING

v.

IRMA OLGUIN, JR., and
JAKE SOBERAL,

Defendants.

Upon the parties' stipulation, and for good cause shown, the preliminary hearing that is scheduled for July 18, 2024, is vacated, and a change of plea hearing is scheduled for July 17, 2024, at 8:30 a.m. before a District Judge.

Time under the Speedy Trial Act has already been excluded through July 18, 2024. Time under the Speedy Trial Act is further excluded from the date the parties' stipulation was filed through July 17, 2024, for purposes of plea negotiations, defense preparation, and continuity of defense counsel pursuant to Fed. R. Crim. P. 5.1(d) and 18 U.S.C. § 3161(h)(7)(A) and

1 (h)(7)(B)(iv). The Court finds that the interests of justice served by granting this request
2 outweigh the best interests of the public and the defendant in a speedy trial.

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4 IT IS SO ORDERED.

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Dated: July 2, 2024

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE